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June 28, 2024

VIA ECF

Honorable Valerie Figueredo United States Magistrate Judge Southern District of New York 500 Pearl Street New York, New York 10007

> Re: <u>GateGuard, Inc. v. Amazon.com, Inc. et al., Case No. 21 Civ. 09321 (JGK)(VF)</u> <u>Motion to Compel Filed at Dkt. 142.</u>

Dear Judge Figueredo,

I represent the Plaintiff, GateGuard, Inc. ("Plaintiff" or "GateGuard"), in the above-captioned matter.

On June 24, 2024, your Honor directed Plaintiff to indicate whether it intended to pursue the Motion to Compel filed at Dkt. 142. Plaintiff has still been unable to serve Boruch Hersh of Nieuw Amsterdam Property Management. Plaintiff respectfully requests an additional two weeks to attempt to serve Mr. Hersh and resolve the outstanding subpoena. As the Court has not yet rendered its decision on the pending motion for leave to file a second amended complaint, Plaintiff submits there would not be any prejudice from a short additional extension. Accordingly, Plaintiff respectfully requests until July 12, 2024, before the motion is definitively closed.

I thank your Honor for your courtesies in this matter.

cc: All counsel of record (via ECF)

MEMO ENDORSED

HON. VALERIE FIGUEREDO UNITED STATES MAGISTRATE JUDGE DATED: July 2, 2204

The extension requested herein is granted. Plaintiff has until July 12, 2024 resolve this matter. The Clerk of Court is respectfully directed to terminate the Motion at ECF No. 195.

Respectfully submitted,

Den Quainton

Eden P. Quainton